



State of Ohio Environmental Protection Agency

Northeast District Office

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Bob Taft, Governor
Christopher Jones, Director

January 10, 2000

RE: HUKILL CHEMICAL CORPORATION
OHD 001 926 740
#02-18-0315
CUYAHOGA COUNTY

US EPA RECORDS CENTER REGION 5



526381

Mr. Mike Mraz
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

CERTIFIED MAIL

Dear Ms. Zylko:

On December 20, 1999, the Ohio EPA, Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection of the Hukill Chemical Corporation (HCC), located at 7013 Krick Road, Bedford, Ohio. The purpose of the inspection was to evaluate the facility for compliance with Ohio's hazardous waste laws and regulations as found under the Ohio revised Code and the Ohio Administrative Code ("ORC and OAC" respectively). HCC was represented by Jennifer Zylko and you. Ohio EPA was represented by Frank Zingales and me. Ohio EPA's inspection included an inspection of facility operations and a review of written documentation. I have included copies of the inspection checklists for your records.

Briefly, HCC is a chemical distribution center, a solvent recovery facility and a hazardous waste fuel blender. The solvent recovery facility accepts spent industrial solvents from off-site industries and reclaims solvents for return to the generating industry or sale to other industries. Solvent recovery consists of two (2) thin film evaporators and a fractionation distillation tower. HCC blends hazardous waste to form hazardous waste fuels for use in cement kilns. HCC also brokers waste as one of its hazardous waste activities

The following violations were noted at the time of this inspection:

1. OAC rule 3745-52-34 , Labeling and dating accumulation containers:

While being accumulated on-site, each container with hazardous waste contents must be labeled or clearly marked with the words "Hazardous Waste" and the date upon which the accumulation period began.

- A. During the inspection of the less-than-ninety (<90) day hazardous waste accumulation area within the Luwa room, Ohio EPA observed twenty-two (22), fifty-five (55) gallon drums without accumulation start dates. These drums contained plant clean-up (PCU) waste and laboratory samples which were being disposed.
- B. During the inspection of the permitted storage area, Ohio EPA observed four (4), fifty-five (55) gallon drums, located near the Hochmeyer, without accumulation start dates. These drums contained PCU and blowdown waste.
- C. During the inspection of the permitted storage area, Ohio EPA observed ten (10), fifty-five (55) gallon drums, which were labeled with the words "FLUSH." These drums contained spent solvent from flushing process lines. Additionally, Ohio EPA observed two (2), fifty-five (55) gallon drums, which were labeled "Proc 2, 4 DCP Intermed."



Neither accumulation start dates nor labeling/markings with the words "Hazardous Waste" were observed on these drums.

To abate this violation, please submit photographs of the drums which clearly show that they have been properly labeled. If the drums have been processed, please submit the corresponding date and processing sheet. HCC must also submit, in writing, what actions will be taken to ensure that all drums containing hazardous waste are properly labeled and dated in order to maintain compliance with this rule.

HCC should develop a procedure that clearly delineates drums containing either hazardous or non-hazardous waste streams, or process materials. This issue was mentioned in a previous compliance evaluation inspection letter dated March 10, 1998. Additionally, any satellite accumulation drum should be apparent from its location and identification.

2. **OAC rule 3745-65-31, Maintenance and operation:**

Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- A. During the inspection of the fuels processing area, Ohio EPA observed hazardous waste on the floor. The waste was most noticeable under the conveyor system exiting the corer and heavy deposits were observed beneath the Hochmeyer. Absorbent mats had been placed alongside the drip pans for the process equipment since free liquid was emanating from them. Additionally, free liquid was observed emanating from the drum wash out area.
- B. During the inspection of the permitted storage area, Ohio EPA made the following observations:
- ◆ One (1), fifty-five (55) gallon drum (manifest 40061, profile 6917) was observed with hazardous waste accumulating on the side of the container.
 - ◆ One (1), fifty-five (55) gallon drum (profile 7339, received 12/4/99) was observed with hazardous waste accumulating on the side of the container which partially covered Hukill's identification label. A portion of the drum's contents had been processed and placed back into storage.
 - ◆ One (1), fifty-five (55) gallon drum (manifest 40064, profile 2469) was observed with free liquid accumulating on the top of the container.
 - ◆ One (1), fifty-five (55) gallon drum (manifest 3946, profile 4607) was observed with hazardous waste accumulating on the side of the container .
 - ◆ Additionally, during the inspection of <90 day hazardous waste accumulation area, three (3), fifty-five (55) gallon drums were observed with hazardous waste accumulating on the top or side of the container. The waste had been spilled on the container during filling.

To abate the violation, please provide the following:

- A. Photographs that clearly demonstrate that the hazardous waste found accumulating in the areas surrounding and beneath the Hochmeyer, corer, drum washout process, and conveyor system has been cleaned-up or removed;
- B. A drum spill and leak plan which outlines how releases or accumulations on them will be cleaned-up. Please provide a discussion on how facility personnel will be instructed to follow the drum spill and leak plan. The plan must be incorporated into the facility personnel training program;
- C. A revised spill and leak plan for the drum processing area, and a discussion on how facility personnel will be instructed to follow the plan. This plan, as well, must be incorporated into the facility personnel training program. Ohio EPA's NOV letter dated April 20, 1994, required HCC to develop and institute this plan. Additionally, Ohio EPA's NOV letter dated April 2, 1997, required HCC to submit a revised spill and leak control plan in response to poor housekeeping.

3. **OAC rule 3745-66-74(B), Container inspections:**

Weekly inspections shall be conducted where containers of hazardous waste are stored, looking for leaks and for deterioration of the drums. Records of these inspections shall be maintained in a log. At a minimum these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action.

HCC failed to record the time of inspection and the name of the inspector on the inspection log for the less than 90 day container accumulation area. To abate this violation, please submit a blank revised form and 2 weeks worth of completed inspection records.

The following items are not violations but are concerns resulting from this inspection:

- 1. During the inspection of the permitted storage area, one (1), fifty-five (55) gallon drum (manifest 40093, profile 4717) was leaking its non-hazardous waste contents. The contents had leaked from the drum's ring top and accumulated on the container beneath. Although this was a non-hazardous waste, all leaks from any drum should be immediately stopped and the residue cleaned-up.
- 2. During the inspection of the permitted storage area, two (2), fifty-five (55) gallon drums were positioned so that their identification labels were not viewable. These drums were observed within aisle two. In the future, HCC should ensure that labels on all drums containing waste are readily visible.
- 3. During the inspection of the dock area, eight (8), fifty-five (55) gallon drums were observed to be crushed. Although these drums contained product, their integrity was poor. HCC may wish to transfer the material into new drums.

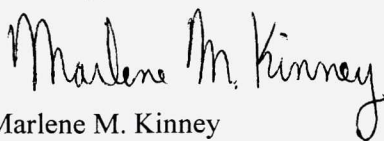
4. The T-52, T-53, and T-55 secondary containment tank dike was filled with water. The tank dike was being pumped by the end of the inspection.
5. HCC is conducting daily inspections of the tanks and ancillary equipment, as is required by the rule. After a thorough review of the checklist used for the daily tank inspections, Ohio EPA has determined that the inspection checklist should be reformatted, specifically page two (2) of Exhibit F-7 (the checksheet may be found in the part B permit application). This review came about in part due to this inspection and the recent Class 1 permit modification that made some changes to exhibit F-7. Page 1 of exhibit F-7 calls for inspection of each permitted hazardous waste storage tank, the less-than-ninety day generator tanks and the tanker trucks. The elements that are inspected include the specific tank, the volume of waste being stored in each tank, a space to indicate the tank was inspected, and an area for any remarks.

Page 2 of the checklist is used for daily inspections of many areas, such as tank storage, container storage, and security devices. The checklist should be reformatted such that the checklist requires each specific tank dike to be inspected, that ancillary equipment and piping for all tanks is inspected, that the sump of each tank dike is working, that the tank dikes are free of standing water, etc. This issue will be addressed in future correspondence.

Please submit the requested information to my attention within 30 days of receipt of this letter. Failure to list specific deficiencies in this communication does not relieve HCC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve HCC from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please do not to hesitate to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddb

cc Natalie Oryshkewych, DHWM, NEDO
Frank Zingales, DHWM, NEDO
Linda Neuman, DHWM, CO
Sheila Burrus, USEPA, Region 5, DE-9J